

**REMARKS**

**I. STATUS OF THE CLAIMS**

Claims 1 and 3-10 are currently pending.

**II. CLAIM OBJECTIONS**

Responsive to the Examiner's helpful suggestions in Item 1 of the outstanding Office Action, the claims have been amended to improve form.

**III. REJECTION OF CLAIMS 1 AND 3-8 UNDER 35 U.S.C. §102(A) AS BEING ANTICIPATED BY TSAI ET AL. (PN 6,713,856, OF RECORD).**

Claim 1 of the present application has been amended to recite a lowermost semiconductor device and further comprising a back surface protective film, and a heat radiation layer of a material having a high heat transfer rate, on the non-device pattern surface of the lowermost semiconductor device, and said back surface protective film is bonded to a back surface of the stacked body by bonding an epoxy resin film to form the back surface protective film.

Claim 1 was specifically amended to improve the form of the claim. Particularly, the comma in line 12 of currently amended claim 1 of the present application was deleted to clarify that the heat radiation layer was comprised of a material having a high heat transfer rate. Additionally, claim 1 was further amended to clarify that the back surface protective film is bonded to a back surface of the stacked body by bonding an epoxy resin film to form the back surface protective film.

Support for the amendments in claim 1 of the present application can be found in at least Page 7, lines 33-37; page 13, lines 13-18; page 19, lines 5-8; FIG. 4; and FIG. 6J of the present application.

The Examiner asserts in the outstanding Office Action that "Tsai et al. discloses, as this shown in Figures 2-3, a back surface protective film (26) on the semiconductor package and a heat radiation layer (27) is formed on the protection film." No portion of the Tsai reference discloses or suggests a back surface protective film as recited in currently amended independent claim 1 of the present application.

In contrast to currently amended claim 1 of the present application, the Tsai reference teaches a thermally and electrically conductive adhesive layer 26, such as a copper paste, disposed on the inactive side 22 of the first chip 20 and the lower surface 14 of the substrate 12. See column 2, lines 44-47.

The above comments are specifically directed to claim 1. However, it is respectfully submitted that the comments would be helpful in understanding various patentable differences of various other claims over the cited references.

In view of the above, it is respectfully submitted that the rejection is overcome.

**IV. REJECTION OF CLAIMS 1 AND 3-10 UNDER 35 U.S.C. §103(A) AS BEING UNPATENTABLE OVER HSU (PN 5,627,106) IN VIEW OF PALM ET AL. (US 2004/0056346).**

In view of the arguments asserted above in section III. and the amendment to currently amended claim 1 of the present application, it is respectfully submitted that the rejection has been overcome.

Specifically, the Examiner asserts that the back surface protective film as recited in claim 1 of the present application is represented by element 7 in the Palm reference. However, Palm teaches that the pressure-sintered connection layers 2, 7, 10 are produced by a silver powder suspended in a solved being applied to at least one of the surface areas respectively to be connected. See paragraph [0022].

Currently amended claim 1 of the present application recites wherein said back

surface protective film is bonded to a back surface of the stacked body by bonding an epoxy resin film to form the back surface protective film.

The above comments are specifically directed to claim 1. However, it is respectfully submitted that the comments would be helpful in understanding various patentable differences of various patentable differences of various other claims over the cited references.

In view of the above, it is respectfully submitted that the rejection is overcome.

## V. CONCLUSION

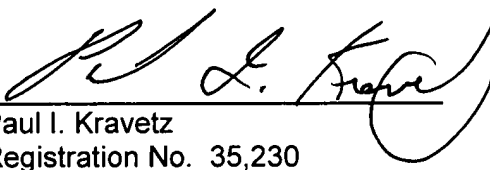
If there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

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Date: October 11, 2005

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